

United States District Court Southern District Of New York

Queen'Prinyah Godiah NMIAA Payne's El-Bey

Case#: 20-CV-0524(MKV)
Plaintiff Responding back to
MTA/
MTA-Attorney Letter

Plaintiff

-against-

Defendant's:

Crocilla, Cona, Michels, Porter, Vallas, Ward

Metropolitan Authority Police Benevolent Association & Police Benevolent Association
Metropolitan Transportation Authority, MTA & MTA 34 precinct @ Penn Station, The
City Of New York, Bellevue Hospital & Staff's, et al.,

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Dear, Judge MARY KAY VYSKOCIL, United Sates District Judge:

MTA knew about the attack because court exhibits documents showed where MTA
stamp the complains on two separate occasion also when I plaintiff made several
attempted with friends to served MTA at differences offices, place like 2broadway NYC
was threatened by security(ies) staffs to have police call on us for trespassing and/or
was giving false information's, also several mailed was send out to different MTA via
United Stated postal office proof was attached to Dockets to trying to served MTA in the
middle of the crazy Pandemic. I the plaintiff even went to the New York Stated, 1 Centre
Street and several other places trying to get MTA correct office, place where to served
MTA, I reach out to Mr. Hossein & Mr. Williams from the City of New York explaining to

them then they leads me to the right place where to go, furthermore MTA and those empowers kept blocking me refused me due-process assets to the case nor give me update, where I reach to the point where I had to force to get an Attorney involved and /Attorney Fu got involved so I could know what is/was going on since I was kept told "you're not an Attorney we cannot give you any information's, sorry." Being frustrated and being ignored about my demands by those who are in powers/ by those that can who supposed to abide by the laws after all am the victims, am the one that Constitutional Lawful-Legal Rights was violated over and over again and several phone calls was made by/to those that supposed to protect "We The People" the public was ignore because as part of "We The People" under the Constitutional Of Corporations of America have lawful Rights to not have our rights violates by either Government and/or/nor those that works for the Government. I do not trust the systems at all and that is more reason why I will not have a mouth-piece a.k.a so call Attorney representing me after all I got screwed repeatedly and I refused to continue the systems to screw me over again after violated my Rights/Lawful-Legal Rights and my Constitutional Rights. I know am not an Attorney nor do I work for this Corrupt-evil systems. I have the rights for my rights not to be violated and/or/nor violate by the systems nor those that works/licenses/part-take of them. I will fight until I get True-Justice for the evil that was done to me by Officer Crocilla and his partners in crime and force-arrest also Bellevue Hospital violated my Constitutional Rights when I plead the fifth by threaten to amid me to psych ward if I refused to answer their questions and turned around put false statement in my hospital record.

- [Amendment I](#)

1.)1. The government cannot make you believe in a religion.

2.)2. The government cannot keep you from practicing any religion you choose.

3.)3. The government cannot keep you from saying what you wish.

4.)4. The government cannot keep you from writing what you want.

5.)5. The government cannot stop you from publishing what you want.

6.)6. The government cannot keep you from joining together peacefully with others to express your views.

7.) 7. The government cannot prevent you from complaining about what the government or others are doing to you.

* [Amendment II](#)

8. The government cannot take away your right to own and keep guns.

My rights were violated and the only reason why Crocilla knew about my Guns by him made statement in his note report about the Allah/Guns/what he stated in his reported is because when I used to social media before he stated harassing me on them I used to posted information's about Guns,

As Proud Guns Owners and shown my guns Also as Proud Member of the NRA.

- [Amendment V](#)

8.)11. The government cannot hold you in jail for a major crime without the knowledge and approval of your fellow citizens

**9.)13. The government cannot make you incriminate yourself.
(Bellevue hospital staffs tried)**

10.) 14. The government cannot take away your life, liberty, or property without following the law.

(Crocilla and his partners in crimes along with Bellevue hospital and workers did so, then lies in their paperwork's to cover their Derriere.)

[Amendment VI](#)

16. The government cannot hold you in jail for a long time without a trial if you are accused of having broken the law.

(Still to this I want to know what laws I broke that I was falsely arrested, attack, force to psych ward without my consent I want to know what Constitutional Laws I breached?)

17.) 18. The government cannot keep secret from you those who will speak against you. (Those who are in powers done/does so by denying me due-process/ by denying me information's on the statues of the case and by denying me accesses to the documents/investigations.

18.) 20. The government cannot keep you from having other people help you defend yourself in a courtroom. (Those in Powers done so and continued to do so.)

19.) 23. The government cannot punish you for a crime in a cruel and unusual way. (Throwing someone who is disable in wheelchair, hiding someone with a baton on the head, put your foot in middle of someone chess who have a medical heart device place between their chess to protect their life and because of such cruelty that device have to be medically-surgically removed out of my chess soon and be replace because of Officer Crocilla Cruelty.)

20.) [14th Amendment:](#)

Amendment XIV

Section 1.

All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any

person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

The Constitution states only one command twice. The [Fifth Amendment](#) says to the federal government that no one shall be "deprived of life, liberty or property without due process of law." The [Fourteenth Amendment](#), ratified in 1868, uses the same eleven words, called the Due Process Clause, to describe a legal obligation of all states.

- The first ten Amendments to the Constitution, which set out individual rights and liberties.

American Indian Law

- American Indian law: an overview
- In U.S. law the term "Indians" refers generally to the indigenous peoples of the continent at the time of European colonization. "Alaska Natives" and "Native Hawaiians" refer to peoples indigenous to the areas...
- A civil right is an enforceable right or privilege, which if interfered with by another gives rise to an action for injury.
- Discrimination occurs when the civil rights of an individual are denied or interfered with because of the...
- The Thirteenth Amendment outlawed involuntary servitude. The Fourteenth Amendment made it illegal for a state to pass laws

"which shall abridge the privileges or immunities of the citizens of the United States... [or] deprive any person of life, liberty, or property without due process of law, [or] deny to any person within its jurisdiction the equal protection of the laws."

(What officers Crocilla and his Partners in Crimes along with Bellevue and Bellevue staffs hospital did was false imprisonment & violated many other laws) :

False imprisonment is an act punishable under [criminal law](#) as well as under [tort law](#). Under tort law, it is classified as an [intentional tort](#). A person commits false imprisonment when he commits an act of restraint on another person which confines that person in a bounded area.

Prima Facie Case

- i. The defendant willfully acts . . .
- ii. . . . intending to confine the plaintiff without the plaintiff's consent and without authority of law
- iii. the defendant's act causes the plaintiff's confinement
- iv. the plaintiff is aware of his/her own confinement

Bounded Area:

An act of restraint can be a physical barrier (such as a locked door), the use of physical force to restrain, a failure to release, or an invalid use of legal authority. An area is only bounded if freedom of movement is limited in all

directions. If there is a reasonable means of escape from the area, the area is not bounded

21.) 42 U.S. Code § 1981 - Equal rights under the law:

(a) STATEMENT OF EQUAL RIGHTS

All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

(Those who are in Powers continued to breach such laws by refusing me accessed update statues to the case against Crocilla and Crocilla Partners in crimes, Bellevue Hospitals, and staffs also those who continued cover for those who wrong-me.?)

22.) The Constitution's 5th and 14th amendments prohibit all levels of government, which includes the police, from unfairly or arbitrarily depriving individuals of their rights to life, liberty, and property. (yet my rights were violated by Officer Crocilla and Partners in Crime along with Bellevue Hospital and Staffs:

“Answering Defendant Letter to The Judge:

I represent Defendant Metropolitan Transportation Authority, named here as the “MTA” and “MTA 34th Precinct @ Penn Station,” in the above-referenced action. I write to address the MTA’s response to the Second Amended Complaint (Dkt. No. 38) and to join in the request filed by counsel for the individual MTA police officers for a conference to address that response. Insofar as the ECF docket presently reflects that the MTA is due to respond to the complaint by October 8, 2021, the MTA requests an extension of its time to respond.

Plaintiff Respond:

I the plaintiff rebuke and reject/disagree with Defendant for extension of its time to respond because the facts of the case, MTA knew about the facts of the case way before, heck all parties involved knew about the facts of the case and MTA Attorney send me a link to do a Deposition via zoom last-month that am still waiting for the transcripts, MTA and MTA Attorney knew the facts of the case and had plaintiff of times to get their ducks-together.

- Way before the Judge made the errors by removing MTA and added the City of New York in the docket court case, MTA was notified about being sue for hiring officers like Crocilla who abuse his powers and cause harms to innocent people/ the public and harassed his victims after the facts in ways to bring fears/silence his victims for not taking legal actions.

As counsel for the individual officers noted in their letter to the Court, the Second Amended Complaint largely concerns Plaintiff's arrest by MTA police officers on January 9, 2020, and the degree of force used in that arrest (**Partial correct**).

But the complaint also cites a large number of laws that have no bearing on this subject matter or even provide a private right of action. **(Your 100% incorrect in such Statement, because the Complain stated the laws that was violated against Plaintiffs. Those laws are the fact I the Plaintiff knew was violated, so this excused statement is your ways trying to get out of taking responsibility for actions that was taking by racist people/individuals your company hired to supposed protect, guided the publics not abused their powers/not attacked them just because they have powers to do so/not abused their powers/not harassed the victims after victimized that individual. If you think I will/I am going to allowed those who are part-taking and continued to cover up for those who done me wrong to get away with such evil-crime that was done to me you better think again because am ready to fight this case out of state or international court, so do not play games with me, My freedoms is extremely important to me and those who took it by force/ those who abused it/ those who done so without my consent am ready to fight anyone, any place, any times for my Constitutionals rights and other rights that was violated against me, so please stop your lies because I will called every lies out so extremely-bluntly with no filter.)**

Additionally, the complaint includes multiple attachments with a Southern District pro se complaint form—two of which are typed documents that are also labeled “amended complaint,” **(Let me clarify this for you, I also open another case with almost same**

issued except am asking for criminal charges and those who part taking of doing me evil to get fired also those who still covering up for the ill that was done to me in Supreme Court Of New York also in order courts. Also, since the Judge said she was going to remove the City Of New York if I added the City Of New York in the Amended Complaint but she also stated I could sue them so I took her advice I filed a Supreme Court in New York City Court case #: 101047/2021 added other parties that are involved, part-taking/covering up for the evil-wrong-ill that was done to me, also since I have been requesting true-justice I wants criminal charges against those who done me the evil-wrong and since am not sure if the Federal Court have the powers to do so I make sure I cover all of my roadmaps including complain to the Executive Branch to listed to me, no-one who done me wrong will get away with it and those who cover for those that did me wrong their nakedness I will published to the World/Globe. Understand there will not be no monetary(ies)/\$\$\$ settle on/in this case without those who done me wrong be criminal charge and be fired, also those who part-taking cover and continued cover for those that done me ill/that stole my Constitutionals Rights & other Lawful Rights.)

What do you mean by “provide a private right of action”?

(Am not sure with this statement if you’re talking about laws or what?... or if you’re stating what are my demands, if that is the case take the times go back to all the documents that I submitted to the courts then come back to me with this behavior-question. After all, in your Depositions last month if you had such

question why you did not ask me, I was an opened book and am still an opened books to call out b's without no filter.)

In Additional since but none of which has numbered paragraphs— **(I take this part of statement as an insult as how I write/my written style, excused you am not Mr. Perfect writer as yourself is/are.)** leaving it unclear what the allegations are, to which defendants are expected to respond. **(if your so confused review the court dockets used pacer maybe that shall unconfused you, or are you trying to used b's to get out of this case, and if your also still confused review Supreme Court Docket case Number: 101047-2021, now am wondering what your future next excuses will be.)** And many of the hand-written allegations are also illegible. **(again I take this statements as an Insult, also during your depositions last month you went one by one questions with my handwriting in the documents you had if you had any concerned or questions then I was an opened book I would answered them just like I read the documents and I answered your questions then so please stop with your b's excused trying to get out of this case.)**

Finally, although Plaintiff submitted an affidavit of service (Dkt. No. 40) asserting that she served the MTA on September 17, 2021, Plaintiff merely mailed copies by U.S.P.S. Certified Mail, as reflected in the scanned Certified Mail Receipts she included, without including a summons or F.R.C.P. 4(d) waiver form, and even those documents weren't received until recently.

(Again, another excused to get out of this case, complaining about what I send you, according to what I understood since you were going to be added back into the case it's the Pro-Se office supposed to mailed you and also the Judge had

stated something like the court would mailed parties involved, also what I send you was not received, I mailed the Supreme Court docket # on one enveloped and the other enveloped was the amended complaint for this case that I had send you with a note to go to pacer if you wants view other Supreme Court/Documents regarding this case and plus Supreme Court case Docket. Again, your full of B's Excuses trying to get out of this case. If you have concerned about the mailed, I cannot controlled the Government nor can tell US Government agency(ies) like the United States Postal Services Offices how or when they shall delivers documents after all we are still in Pandemic and things are still picking up so if you have a complaint because you did not get your mailed on time your are in Attorney please go complaint to the USPS. And if you still want to cried over documents please feel free to review them in the court docket file because I have been waiting for over a year almost years plus to get my case to be heard and to get true-justice like I said no-one will stop me nor denied me my true-justice and due-process for my rights that was violated.)

At no point in this action has the MTA been properly served with a summons and complaint, and the Court therefore presently lacks personal jurisdiction over it.

(MTA have been served according, when the case first started the Pro-Se office did served MTA so please cried to the Court/Pro Se office about your complain if you filed you were not served the way you wished too, just called the pro se office and they will be happy to reserved you and also I as Plaintiff have stated before I made several attempted with friends doing our best to served MTA offices/places we were threatened to have police to call on us for trespassing

furthermore in the deposition you stated you did received my complain so please explain which one is it, and I want a copy of the Deposition so I can file it on this court docket and Supreme Court. The Court have the Jurisdiction because as a pro se I can bring my case to any court I wanted also since it is a Federal Court and MTA/ those involved fallen under the Federal laws also as a Multi-Citizen inside Corporation of America I have Constitutional Lawful-Legal Rights to file my grievances to the Government against those who abuse my Rights.)

The MTA has not requested any prior extensions of its time to respond to the complaint, and the MTA has not sought Plaintiff's consent to resolve these issues, because counsel for the MTA believes that, at least at present, such efforts would be futile without the Court's guidance. **"(What do you mean without the Court's guidance)" I do not understand this statement.**

(As Plaintiff I reject for any extensions because I know MTA knew about this after I was violated yet MTA and its Partners in Crimes done all their best to blocks me over and over again now MTA is crying wolves. So please go cried me a river MTA because your wrong for still allowing those people who done me evil worked for your corporation so that way, they can continued created present/future victims and used their powers to abuse it and continued to victimize their victims congrats MTA for been a care-taker of abusers and bitch-slapped victims in/on their faces by still allowed Crocilla and those officers who done me wrong in your payroll.)

In Conclusion:

I posted a reminder of my Constitutional Lawful-Legal Rights that was violated

above, about 624 of the laws Plus over tens of my Constitutionals Lawful-Legal Rights was violated against me by those individuals for my next Amend Complain

I will added all of them maybe then you will not have any reason to complain anymore about my handwritten nor how your served/not served since your be way to busy reading them also, after all you're not the victim.